

From: GROVES, RYAN <RGROVES@idem.IN.gov>

Sent: Wednesday, January 27, 2021 9:26 AM

To: Greenhagen, Andrew <Greenhagen.Andrew@epa.gov>; Tong, William <tong.william@epa.gov>

Cc: Hassan, Jacob <hassan.jacob@epa.gov>

Subject: RE: Newton County Landfill Deep Well injection

Andrew,

Is this permit open for public comment right now?

I have several comments concerning verification of the injected waste being non-hazardous prior to its injection. If hazardous (most likely would be the leachate), the facility must meet standards and pay a disposal fee to IDEM's Hazardous Substance Trust Fund under our law at IC 13-25-4. The leachate should be tested prior to mixing with other material prior to injection. Not after mixing with storm water runoff for instance. Sampling prior to mixing with other material would be considered point of generation sampling. This sampling should be done prior to beginning of injection as a baseline and monthly thereafter....I didn't see anything about contaminant verification in the permit and analytical standards, just physical testing of the well for integrity purposes and aquifer/geology damage and integrity.....

This facility takes in various remediation waste known to be contaminated with high levels of petroleum, chlorinated solvents, auto fluff (potentially with PCBs) and metals. All are supposed to be non-hazardous as they enter the landfill, but concentrated leachate has the potential to be hazardous at this facility and it should be tested and monitored.....

I also have comments regarding registration of these wells with our IDNR Water Well Program and if monthly reports will be given or supplied to our permits manager in our Solid/Hazardous Waste Compliance Program for the facility?

Lastly, I have a comment regarding verification that the injection would comply with Great Lakes Water Quality standards and how EPA ensures that is the case through the permit.....

Thanks for the info.....please let me know regarding public comment period and if I need to submit the above concerns in a more formal way to Mr. Tong.....

Jacob, thanks for getting me connected!

Sincerely,

Ryan

Ryan L. Groves

Section Chief | State Cleanup Program

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